

April 10, 2018

The Honorable Greg Walden  
Chairman, Committee on Energy and Commerce  
United States House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515

The Honorable Frank Pallone  
Ranking Member, Committee on Energy and Commerce  
United States House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515

Dear Chairman Walden and Ranking Member Pallone:

The National Association of Chain Drug Stores (NACDS) commends Chairman Walden and Ranking Member Pallone for your leadership in pursuing policy changes to address the opioid crisis. NACDS and our members remain committed to partnering with policymakers, law enforcement, and others to work on viable strategies to prevent prescription opioid diversion and abuse. An important element of any strategy to combat the opioid crisis should include policies that improve medication education and management and related services. As such, NACDS supports the expansion of community-based services and an enhanced role of retail community pharmacists in identifying and treating those with opioid addiction and believe this can best be accomplished through passage of H.R. 592/S. 109, the *Pharmacy and Medically Underserved Areas Enhancement Act*.

NACDS represents traditional drug stores, supermarkets and mass merchants with pharmacies. Chains operate over 40,000 pharmacies, and NACDS' nearly 100 chain member companies include regional chains, with a minimum of four stores, and national companies. Chains employ nearly 3 million individuals, including 152,000 pharmacists. They fill over 3 billion prescriptions yearly, and help patients use medicines correctly and safely, while offering innovative services that improve patient health and healthcare affordability. NACDS members also include more than 900 supplier partners and over 70 international members representing 20 countries. Please visit [www.NACDS.org](http://www.NACDS.org).

Access, quality, cost, and efficiency in healthcare are critical, especially for those who are medically underserved and/or are at-risk for substance abuse disorders. These may include seniors with cultural or linguistic access barriers, residents of public housing, persons with HIV/AIDS, as well as rural populations and many others. Many of these

beneficiaries suffer from multiple chronic conditions. Significant consideration should be given to policies and initiatives that enhance healthcare capacity and strengthen community partnerships to offset provider shortages, particularly in communities with medically-underserved populations. Retail pharmacies are often the most readily accessible healthcare provider. Research shows that nearly all Americans (89%) live within five miles of a retail pharmacy.

Despite the ability of pharmacists to improve access and care, current law does not recognize them as a provider in the Medicare program. H.R. 592/S. 109, the *Pharmacy and Medically Underserved Areas Enhancement Act*, would change this recognize pharmacists as providers in medically underserved areas, thus creating better access to services for these vulnerable populations. Not only would recognition of pharmacists improve access, but it would lead to reduced healthcare costs as pharmacists would provide already-covered Medicare services at 85% of the physician fee schedule.

Pharmacists have advanced education and training that equips them to provide many services in addition to their role in providing patients with access to and information about their prescription medications. These services include:

- Health Tests and Screening
- Management of Chronic Conditions and Related Medications
- Immunization Screening and Administration
- Point of Care Testing (e.g. Flu, Strep)
- Transition of Care Services

In addition to these vital services, pharmacists are also trained and equipped to help in the battle against opioid abuse. Examples of ways pharmacists could help include:

- Assisting physicians with opioid treatment programs, which provide medication assisted treatment (MAT) for people diagnosed with an opioid-use disorder. CMS recently recognized the importance of MAT in its final FY2019 Call Letter, when it stated “...it is imperative to also ensure that Medicare beneficiaries have appropriate access to medication-assisted treatment (MAT).”
- Providing greater access to community-based Screening, Brief Intervention, and Referral to Treatment (SBIRT). SBIRT is an evidence-based practice used to identify, reduce, and prevent problematic use, abuse, and dependence on alcohol and substance abuse and includes a referral to treatment for those in need.
- Increased access to naloxone, a medication designed to rapidly reverse opioid overdose. Several states have recognized the importance of ensuring quick access

to this life-saving medication and have employed various approaches to reimburse and make it easier for pharmacists to provide naloxone to patients.

- Increased use of pharmacogenomic testing to determine the right pain medication and dosing. By performing pharmacogenetic testing, personalized medicine allows patients to be prescribed with the right drug to be administered for adequate pain control – to avoid experiencing dose-dependent side effects or lack of drug efficacy. A pain medication may alleviate pain for one patient while proving no relief for another. Pharmacogenetic testing can help alleviate this problem.

Retail community pharmacists are an underutilized resource in helping to identify and treat those with opioid addiction as well as educating consumers on the dangers of opioid abuse and addiction. Recognizing the value pharmacists play as a member of the healthcare team and utilizing them at the top of their training would greatly strengthen the battle against the opioid crisis. NACDS encourages members of Congress to support H.R. 592/S. 109, the *Pharmacy and Medically Underserved Areas Enhancement Act*.

### **Conclusion**

We look forward to working with policymakers and other stakeholders to implement strategies and policies to turn the tide in the opioid epidemic.

Sincerely,

The National Association of Chain Drug Stores